

Exhibit 2

Mario N. Alioto, Esq. (56433)
Lauren C. Russell, Esq. (241151)
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
2280 Union Street
San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
malieto@tatp.com
lauren russell@tatp.com

Lead Counsel for the Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Master File No. CV-07-5944 SC
MDL No. 1917

This Document Relates To:

ALL INDIRECT PURCHASER ACTIONS

**INDIRECT PURCHASER PLAINTIFFS'
FOURTH SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
TOSHIBA DEFENDANTS**

PROPOUNDING PARTY: Indirect Purchaser Plaintiffs

RESPONDING PARTY: Toshiba Corporation, Toshiba America Inc., Toshiba America Consumer Products, LLC, Toshiba America Electronic Components, Inc., and Toshiba America Information Systems, Inc.

SET NUMBER: Four (4)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, the Indirect Purchaser Plaintiffs ("Plaintiffs") hereby request that Toshiba Corporation, Toshiba America Inc., Toshiba America Consumer Products, LLC, Toshiba America Electronic Components, Inc., and Toshiba America Information Systems, Inc. (collectively, "Toshiba") respond to the following requests for production of documents ("Requests"), and produce the documents specified herein, at a location agreed upon by counsel, within thirty (30) days from the date Panasonic receives these Requests.

DEFINITIONS

As used herein, the following items have the meaning indicated below:

1. “You” and “your” mean Toshiba Corporation, Toshiba America Inc., Toshiba America Consumer Products, LLC, Toshiba America Electronic Components, Inc., and Toshiba America Information Systems, Inc., their present or former members, officers, agents, employees, and all other persons acting or purporting to act on their behalf, including all present or former members, officers, agents, employees, and all other persons exercising or purporting to exercise discretion, making policy, and making decisions.

2. The words “all,” “any,” and “each” mean “each and every.”

3. The words “and” and “or” are both conjunctive and disjunctive as necessary.

4. The word “including” is used to illustrate only, and should not be construed as limiting in any way.

5. “Document” shall include all documents and electronically stored information (“ESI”) as defined in Federal Rules of Civil Procedure 34(a). A draft or non-identified copy is a separate document within the meaning of this term.

6. “Employee” means any individual currently in the employ of, or at any time employed by, or acting as the agent of any Panasonic subsidiary, affiliate, joint venture or other related entity.

7. “CRT” means cathode ray tube and includes cathode ray tubes used in color televisions and color computer monitors.

8. “MTPD” shall refer to MT Picture Display Co., Ltd. (f/k/a Matsushita Toshiba Picture Display Co., Ltd.), a joint venture between Panasonic Corporation and Toshiba Corporation, established in April, 2003.

9. “Governmental Antitrust Authority” means any governmental authority, foreign or domestic, responsible for investigating and/or prosecuting antitrust violations.

10. Unless otherwise stated, the “Relevant Time Period” shall mean the period beginning March 1, 1995 and continuing through the present.

INSTRUCTIONS

1
2 1. These Requests seek all responsive documents created or generated during the
3 Relevant Time Period, as well as responsive documents created or generated outside the Relevant
4 Time Period, but which contain information concerning the Relevant Time Period.

5 2. To the extent documents or ESI to any of these Requests have already been
6 produced to Plaintiffs, there is no need to produce those documents a second time. Instead, please
7 provide the Bates numbers of any responsive documents already produced.

8 3. These Requests call for the production of all responsive documents and ESI in
9 your possession, custody or control without regard to the physical location of such documents.

10 4. In producing documents, ESI and other materials, you must furnish all documents,
11 ESI or things in your possession, custody or control, regardless of whether such documents, ESI
12 or materials are possessed directly by you or your directors, officers, agents, employees,
13 representatives, subsidiaries, managing agents, affiliates, investigators, or by your attorneys or
14 their agents, employees, representatives or investigators.

15 5. In producing documents and ESI, you must produce the original of each document
16 requested together with all non-identical copies and drafts of that document. If the original of any
17 document cannot be located, a copy shall be provided in lieu thereof, and shall be legible and
18 bound or stapled in the same manner as the original (to the extent this is known).

19 6. Pursuant to Federal Rule of Civil Procedure 34(b), documents shall be produced as
20 they are kept in the usual course of business and shall be organized and labeled to identify any
21 file number, file name, or any other file identification system utilized by the responding party, as
22 well as the location and custodian of such records. These Requests include Plaintiffs' request to
23 physically inspect any file drawer, filing cabinet or any other storage device where documents
24 responsive to these requests are maintained at the time of the inspection of such documents.

25 7. Documents attached to each other should not be separated. If any portion of any
26 document is responsive to any portion of the Requests, then the entire document must be
27 produced.
28

1 8. All documents produced should be numbered sequentially, with a unique number
2 on each page, and with a prefix identifying the party producing the document.

3 9. Documents shall be produced in such fashion as to identify the department, branch
4 or office in whose possession they were located and, where applicable, the natural person in
5 whose possession they were found (*i.e.*, the document custodian) and the business address of each
6 document custodian.

7 10. Pursuant to Federal Rule of Civil Procedure 34(b)(1)(C), you must produce any
8 ESI in its native format. If ESI in its native format can only be accessed by proprietary or legacy
9 software, you shall provide all information and software necessary to access the ESI.

10 11. If any responsive document was, but no longer is, in the possession of or subject to
11 your control, state whether it (i) is missing or lost, (ii) has been destroyed, (iii) has been
12 transferred, voluntarily or involuntarily, to others, or (iv) has been otherwise disposed of.

13 12. In each instance in which a document once existed and subsequently is lost,
14 missing, destroyed or otherwise disposed of, explain the circumstances surrounding the
15 disposition of the document, including but not limited, to:

- 16 a. the identity of the person or entity who last possessed the document;
17 b. the date or approximate date of such disposition; and
18 c. the identity of all persons who have or had knowledge of the document's
19 contents.

20 13. In the event that you object to any Request on the ground of privilege or attorney
21 work product, a statement shall be provided as to each document which includes:

- 22 a. the name of the document author;
23 b. the name of the document's recipient;
24 c. the names of the persons to whom copies were sent;
25 d. the job title of every individual named in (a), (b), and (c) above;
26 e. the date the document was created, sent, or received;
27 f. the location of the document;
28 g. the custodian of the document;

- 1 h. a brief description of the nature and subject matter of the document; and
- 2 i. a statement of the privilege asserted and each and every fact or basis upon
- 3 which a privilege is claimed or on which the document is otherwise withheld.

4 Notwithstanding the assertion of any objection to production, if a document contains non-

5 objectionable or non-privileged matter, please produce that document, redacting that portion for

6 which the objection is asserted, provided that the identification requested in paragraphs (h) and (i)

7 above are furnished. A log itemizing each of these documents and this corresponding information

8 that forms the basis for your objection on privilege or work product grounds shall be served

9 contemporaneously with your responses to these document requests.

10 14. Each document should be produced in its entirety and without deletion, redaction

11 or excisions, except as provided by Instruction 12 above, regardless of whether you consider the

12 entire document or only part of it to be relevant or responsive to these Requests. If you have

13 redacted any portion of a document, stamp the word "REDACTED" beside the redacted

14 information on each page of the document which you have redacted. Any redactions to such

15 documents produced should be identified in accordance with Instruction 12 above.

16 15. The following Requests are continuing in nature pursuant to Rule 26(e) of the

17 Federal Rules of Civil Procedure so as to require the prompt production of supplemental or

18 additional responsive documents when you become aware of such, up to and including the time of

19 trial.

20 **DOCUMENT TO BE PRODUCED**

21 **REQUEST NO. 48**

22 All documents reflecting discussions which led to the formation of MTPD.

23 **REQUEST NO. 49**

24 All documents reflecting discussions regarding the decisions to shut down worldwide

25 CRT manufacturing facilities between 2003 and the present, for MTPD.

26 **REQUEST NO. 50**

27 All documents relating to discussions regarding Panasonic's acquisition of Toshiba's

28 stake in MTPD in or around April 2007.

REQUEST NO. 51

All documents relating to your due diligence regarding Panasonic's acquisition of Toshiba's stake in MTPD in or around April 2007.

REQUEST NO. 52

All documents including, without limitations, financial statements, reflecting contributions of assets and liabilities that MTPD received from you between 2003 and 2009.

REQUEST NO. 53

All MTPD's documents including, without limitations, financial statements, reflecting contributions of assets and liabilities that MTPD received from you between 2003 and 2009.

REQUEST NO. 54

All documents relating to payments of dividends or other profits paid by MTPD to you between 2003 and 2009.

REQUEST NO. 55

All business plans, reports, and forecasts prepared by MTPD from 2003 to 2009 which were submitted to you, including but not limited to those used for the monthly business unit meetings conducted at PAVC. *See* Tobinaga 30(b)(6) Tr. 22:25-28:12.

REQUEST NO. 56

All business plans, reports, and forecasts prepared by MTPD from 2003 to 2009 which were submitted to you, including but not limited to those used to create your business plans.

REQUEST NO. 57

All documents relating to the rules and policies of any board or committee governing MTPD from 2003 to 2009.

REQUEST NO. 58

All documents relating to your assistance or participation in the procurement of any loans or other capital from third parties during the Relevant Time Period including, without limitations, any guarantees you made, for MTPD.

REQUEST NO. 59

All documents relating to the pricing or prices of CRTs you purchased from MTPD during

1 the Relevant Time Period including, without limitations, any pricing negotiations, price lists, and
2 any agreements by you to pay in advance for the delivery of CRTs you bought.

3 **REQUEST NO. 60**

4 All documents relating to insurance policies covering MTPD and/or their respective
5 employee(s) including, without limitations, documents relating to the payment of those insurance
6 premiums.

7 **REQUEST NO. 61**

8 All documents relating to or constituting any periodic reports provided by MTPD to you.

9 **REQUEST NO. 62**

10 All documents relating to or constituting statements to any Governmental Antitrust
11 Authority relating to CRTs by any Employees of the following entities:

- 12 i. You; and/or
13 ii. MTPD.

14 **REQUEST NO. 63**

15 All documents relating to or constituting statements to any Governmental Antitrust
16 Authority relating to CRTs by any employee of any Defendant.

17 **REQUEST NO. 64**

18 All documents from 2000 to 2003 concerning your analyses of LP Displays International,
19 Ltd. (f/k/a LG.Philips Displays)'s business model and your information exchange with LP
20 Displays regarding the formation of MTPD.

21 Dated: August 1, 2014

22 By: /s/ Mario N. Alioto
23 Mario N. Alioto, Esq. (56433)
24 Lauren C. Russell, Esq. (241151)
25 TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
26 2280 Union Street
San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
malioato@tatp.com
lauren russell@tatp.com

27 *Lead Counsel for the Indirect Purchaser Plaintiffs*

CERTIFICATE OF SERVICE

I, Vanessa Buffington, declare that I am employed with the law firm of Trump, Alioto, Trump & Prescott LLP, whose address is 2280 Union Street, San Francisco, California 94123. I am over the age of eighteen years and not a party to the within-entitled action. On August 1, 2014, I caused a copy of the following documents to be served:

INDIRECT PURCHASER PLAINTIFFS' FOURTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO TOSHIBA DEFENDANTS

via electronic mail to the parties below:

Jeffrey L. Kessler A. Paul Victor Eva W. Cole Molly M. Donovan Winston & Strawn LLP 200 Park Avenue New York, NY 10166 Tel: 212-294-4692 Fax: 212-294-4700 Email: jkessler@winston.com pvictor@winston.com ewcole@winston.com mmdonovan@winston.com <i>Counsel for Panasonic Corporation; Panasonic Corporation of North America; and MT Picture Display Co., Ltd.</i>	Steven A. Reiss David L. Yohai David Yolkut Weil, Gosthal & Manges LLP 767 Fifth Avenue New York, NY 10153-0119 Tel: 212-310-8000 Fax: 212-310-8007 Email: steven.reiss@weil.com david.yohai@weil.com david.yolkut@weil.com Bambo Obaro Weil, Gotshal & Manges LLP 201 Redwood Shores Parkway Redwood Shores, CA 94065-1175 Tel: 650-802-3000 Fax: 650-802-3100 Email: bambo.obaro@weil.com <i>Counsel for Panasonic Corporation; Panasonic Corporation of North America; and MT Picture Display Co.</i>
Joel S. Sanders Rachel S. Brass Christine A. Fujita Gibson, Dunn & Crutcher LLP 555 Mission Street, Suite 3000 San Francisco, CA 94105 Tel: 415-393-8200	William Temko Jonathan Altman Hojoon Hwang Laura Lin MUNGER TOLLES & OLSON LLP 560 Mission Street, 27th Floor San Francisco, CA 94105

<p>1 Fax: 415-393-8206 2 Email: jsanders@gibsondunn.com 3 rbrass@gibsondunn.com 4 cfujita@gibsondunn.com 5 <i>Counsel for Chunghwa Picture Tubes, Ltd. And</i> 6 <i>Chunghwa Picture Tubes (Malaysia)</i></p>	<p>Telephone: (415) 512-4000 Facsimile: (415) 512-4077 Email: william.temko@mto.com jonathan.altman@mto.com hojoon.hwang@mto.com laura.lin@mto.com <i>Counsel for Defendants LG Electronics, Inc.,</i> <i>LG Electronics USA, Inc., and LG Electronics</i> <i>Taiwan Taipei Co., Ltd.</i></p>
<p>8 Terrence A. Callan 9 (terrence.callan@pillsburylaw.com) 10 PILLSBURY WINTHROP SHAW PITTMAN, 11 LLP 12 50 Fremont Street P.O. Box 7880 San Francisco, CA 94120-7880 Tel: (415) 983-1000 Fax: (415) 983-1200 13 <i>Counsel for Defendants IRICO Display Devices</i> 14 <i>Co., Ltd., IRICO Group Corporation, and</i> 15 <i>IRICO Group Electronics Co., Ltd.</i></p>	<p>Joseph R. Tiffany (joseph.tiffany@pillsburylaw.com) PILLSBURY WINTHROP SHAW PITTMAN, LLP 2475 Hanover Street Palo Alto, CA 94303-1114 Tel: (650) 233-4500 Fax: (650) 233-4545 <i>Counsel for Defendants IRICO Display</i> <i>Devices Co., Ltd., IRICO Group Corporation,</i> <i>and IRICO Group Electronics Co., Ltd.</i></p>
<p>16 John M. Taladay 17 Erik Koons 18 Charles Malaise 19 Baker Botts L.L.P. 1299 Pennsylvania Avenue, N.W. Washington, DC 20004-2400 Tel: 202-639-7700 Fax: 202-639-7890 20 Email: john.taladay@bakerbotts.com 21 erik.koons@bakerbotts.com 22 charles.malaise@bakerbotts.com 23 Jon V. Swenson 24 Baker Botts L.L.P. 25 620 Hansen Way Palo Alto, CA 94304 Tel: 650-739-7500 Fax: 650-739-7699 26 Email: jon.swenson@bakerbotts.com 27 <i>Counsel for Koninklijke Philips Electronics</i></p>	<p>James Mutchnik Kirkland & Ellis LLP 300 North LaSalle Chicago, IL 60654 312-862-2000 Email: james.mutchnik@kirkland.com <i>Counsel for Defendants Hitachi, Ltd., Hitachi</i> <i>Displays, Ltd., Hitachi Asia, Ltd., Hitachi</i> <i>America, Ltd., and Hitachi Electronic Devices</i> <i>(USA), Inc.</i></p>

<p><i>N.V. and Philips Electronics North America Corporation</i></p>	
<p>Christopher M. Curran Lucius B. Lau Charise Naifeh Dana Foster WHITE & CASE, LLP 701 13th Street, N.W. Washington, DC 20005 Tel: (202) 626-3600 Fax: (202) 639-9355 Email: ccurran@whitecase.com alau@whitecase.com cnaifeh@whitecase.com dfoster@whitecase.com</p> <p><i>Counsel for Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Information Systems, Inc., Toshiba America Consumer Products, L.L.C., and Toshiba America Electronic Components, Inc.</i></p>	<p>Christine A. Laciak (christine.laciak@freshfields.com) Kate S. McMillan (kate.mcmillan@freshfields.com) FRESHFIELDS BRUCKHAUS & DERINGER US, LLP 701 Pennsylvania Avenue, NW, Suite 600 Washington, DC 20004 Tel: (202) 777-4566 Fax: (202) 777-4555</p> <p><i>Counsel for Defendant Beijing Matsushita Color CRT Co., Ltd.</i></p>
<p>Jeremy J. Calsyn (jcalsyn@cgsh.com) Michael R. Lazerwitz (mlazerwitz@cgsh.com) CLEARY GOTTLIEB STEEN & HAMILTON, LLP 2000 Pennsylvania Avenue, NW Suite 9000 Washington, DC 20006 Tel: (202) 974-1500 Fax: (202) 974-1999</p> <p><i>Counsel for Defendant LP Displays International</i></p>	<p>William Diaz (wdiaz@mwe.com) McDERMOTT WILL & EMERY LLP 18191 Von Karman Avenue, Suite 500 Irvine, CA 92612-7108 Telephone: (949) 851-0633 Facsimile: (949) 851-9348</p> <p><i>Attorneys for Defendant Samtel Color, Ltd.</i></p>
<p>Eliot A. Adelson James Maxwell Cooper Kirkland & Ellis LLP 555 California Street, 27th Floor San Francisco, CA 94104 Tel: 415-439-1400 Fax: 415-439-1500 Email: eliot.adelson@kirkland.com max.cooper@kirkland.com</p>	<p>Kathy L. Osborn Faegre Baker Daniels LLP 300 N. Meridian Street, Suite 2700 Indianapolis, IN 46204 Telephone: 317-237-0300 Facsimile: 317-237-1000 Email: kathy.osborn@faegrebd.com</p> <p><i>Counsel for Defendants Technicolor SA (f/k/a Thomson S.A.) and Technicolor USA, Inc.</i></p>

<p>James H. Mutchnik Kate Wheaton Kirkland & Ellis LLP 300 North LaSalle Chicago, IL 60654 Tel: 312-862-2000 Fax: 312-862-2200 Email: james.mutchnik@kirkland.com kate.wheaton@kirkland.com</p> <p><i>Counsel for Hitachi, Ltd.; Hitachi Displayes, Ltd., Hitachi America, Ltd.; Hitachi Asia, Ltd.” and Hitachi Electronic Devices (USA)</i></p>	<p>(f/k/a Thomson Consumer Electronics, Inc.)</p>
<p>Brent Caslin Jenner & Block LLP 633 West 5th Street Suite 3500 Los Angeles, CA 90071 213-239-5100 Fax: 213-239-5199 Email: bcaslin@jenner.com</p> <p><i>Counsel for Defendants Mitsubishi Electric Corporation and Mitsubishi Electric & Visual Solutions America, Inc.</i></p>	<p>Terrence J. Truax Jenner & Block LLP 353 N Clark Street Chicago, IL 60654-3456 312-222-9350 Fax: 312-527-0484 Email: ttruax@jenner.com</p> <p><i>Counsel for Defendants Mitsubishi Electric Corporation and Mitsubishi Electric & Visual Solutions America, Inc.</i></p>
<p>Mark C. Dosker Nathan Lane, III Squire Sanders LLP 275 Battery Street, Suite 2600 San Francisco, CA 94111 Tel: 415-954-0200 Fax: 415-393-9887 Email: mark.dosker@squiresanders.com nathan.lane@squiresanders.com</p> <p><i>Counsel for Technologies Displays Americas LLC and Videocon Industries, Ltd.</i></p>	<p>Calvin L. Litsey Kathy L. Osborn Jeffrey S. Roberts Stephen M. Judge Ryan M. Hurley Faegre Baker Daniels LLP 1950 University Avenue, Suite 450 East Palo, CA 94303-2279 Tel: 650-324-6700 Fax: 650-324-6701 Email: calvin.litsey@faegrebd.com kathy.osborn@faegrebd.com jeffrey.roberts@faegrebd.com stephen.judge@faegrebd.com ryan.hurley@faegrebd.com</p> <p><i>Counsel for Technicolor SA and Technicolor USA, Inc.</i></p>

<p>James L. McGinnis Michael W. Scarborough Dylan Ballard Sheppard Mullin Richter & Hampton LLP Four Embarcadero Center, 17th Floor San Francisco, CA 94111-4106 Tel: 415-434-9100 Fax: 415-434-3947 Email: jmcginnis@sheppardmullin.com mscarborough@sheppardmullin.com dballard@sheppardmullin.com</p> <p><i>Counsel for Samsung SDI Co., Ltd.; Samsung SDI America, Inc.; SDI Mexico S.A. de C.V.; Samsung SDI Brasil Ltda.; Shenzhen Samsung SDI Co., Ltd.; Tianjin Samsung SDI Co., Ltd.; and Samsung SDI (Malaysia) Sdn. Bhd.</i></p>	<p>Emilio Varanini Attorney General's Office State of California Department of Justice 455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102 Tel: 415-703-5908 Fax: 415-703-5480 Email: Emilio.varanini@doj.ca.gov</p> <p><i>Counsel for Plaintiff State of California</i></p>
<p>Jason C. Murray Robert B. McNary CROWELL & MORNING LLP 515 South Flower St., 40th Fl. Los Angeles, CA 90071 Tel: 213-443-5582 Fax: 213-622-2690 Email: jmurray@crowell.com rmcnary@crowell.com</p> <p>Jerome A. Murphy (<i>pro hac vice</i>) Astor H.L. Heaven (<i>pro hac vice</i>) CROWELL & MORNING LLP 1001 Pennsylvania Ave., N.W. Washington, D.C. 20004 Tel: 202-624-2500 Fax: 202-628-5116 Email: jmurphy@crowell.com aheaven@crowell.com</p> <p><i>Counsel for Target Corporation and ViewSonic Corporation</i></p>	<p>Roman M. Silverfeld Bernice Conn David Martinez Jill S. Casselman ROBINS, KAPLAN, MILLER & CIRESI L.L.P 2049 Century Park East, Suite 3400 Los Angeles, CA 90067-3208 Tel: 310-552-0130 Fax: 310-229-5800 Email: rmsilverfeld@rkmc.com dmartinez@rkmc.com jscasselman@rkmc.com</p> <p>Elliot S. Kaplan K. Craig Wildfang Laure E. Nelson ROBINS, KAPLAN, MILLER & CIRESI L.L.P 800 LaSalle Avenue 2800 LaSalle Avenue Minneapolis, MN 55402 Tel: 612-349-8500 Fax: 612-339-4181 Email: eskaplan@rkmc.com kcwildfang@rkmc.com lenelson@rkmc.com</p>

	<p><i>Counsel for Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, LLC</i></p>
<p>Philip J. Iovieno Anne M. Nardacci BOIES, SCHILLER & FLEXNER LLP 30 South Pearl Street, 11th Fl. Albany, NY 12207 Tel: 518-434-0600 Fax: 518-434-0665 Email: piovieno@bsflp.com anardacci@bsflp.com</p> <p>William A. Isaacson BOIES, SCHILLER & FLEXNER LLP 5301 Wisconsin Ave., NW, Suite 800 Washington, D.C. 20015 Tel: 202-237-2727 Fax: 202-237-6161 Email: wisaacson@bsflp.com</p> <p>Stuart Singer BOIS, SCHILLER & FLEXNER LLP 401 East Las Olas Blvd., Suite 1200 Fort Lauderdale, FL 33301 Tel: 954-356-0011 Fax: 954-356-0022 Email: ssinger@bsflp.com</p> <p><i>Liason Counsel for Direct Action Plaintiffs and Attorneys for Plaintiffs Electrograph Systems, Inc., Electrograph Technologies, Corp., Office Depot, Inc., Compucom Systems, Inc., Interbond Corporation of America, P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., ABC Appliance, Inc., Schultze Agency Services LLC and behalf of Tweeter Opco, LLC and Tweeter Newco, LLC and Tech Data Corporation and Tech Data Product Management, Inc.</i></p>	<p>Robert W. Turken Scott N. Wagner Mitchell E. Widom BILZIN SUMBERG MAENA PRICE & AXELROD LLP 1450 Brickell Ave., Suite 2300 Miami, FL 33131-3456 Tel: 305-374-7580 Fax: 305-374-7593 Email: rturken@bilzin.com swagner@bilzin.com mwidom@bilzin.com</p> <p><i>Counsel for Plaintiffs Tech Data Corporation and Tech Data Product Management, Inc.</i></p>

David J. Burman (*pro hac vice*)
 Cori G. Moore (*pro hac vice*)
 Eric J. Weiss (*pro hac vice*)
 Nicholas H. Hesterberg (*pro hac vice*)
 Steven D. Merriman (*pro hac vice*)
 Perkins Coie LLP
 1201 Third Ave., Suite 4900
 Seattle, WA 98101-3099
 Tel: 206-359-8000
 Fax: 206-359-9000
 Email: DBurman@perkinscoie.com
CGMoore@perkinscoie.com
EWeiss@perkinscoie.com
NHesterberg@perkinscoie.com
SMerriman@perkinscoie.com

Joren Bass
 Perkins Coie LLP
 Four Embarcadero Center, Suite 2400
 San Francisco, CA 94111-4131
 Tel: 415-344-7120
 Fax: 415-344-7320
 Email: JBass@perkinscoie.com

Counsel for Plaintiff Costco Wholesale Corporation

Richard Alan Arnold
 William J. Blechman
 Kevin J. Murray
 KENNY NACHWALTER, P.A.
 201 S. Biscayne Blvd., Ste. 1100
 Miami, FL 33131
 Tel: 305-373-1000
 Fax: 305-372-1861
 Email: rarnold@knpa.com
wblechman@knpa.com
kmurray@knpa.com

Counsel for Plaintiff Sears, Roebuck and Co. and Kmart Corp.

Michael P. Kenny
 Debra D. Bernstein
 Matthew D. Kent
 ALSTON & BIRD LLP
 1201 West Peachtree St.
 Atlanta, Georgia 30309-3424
 Tel: 404-881-7000
 Fax: 404-881-7777
 Email: mike.kenny@alston.com
debra.bernstein@alston.com
matthew.kent@alston.com

James M. Wagstaffe
 KERR & WAGSTAFFE LLP
 100 Spear Street, 18th Fl.
 San Francisco, CA 94105-1576
 Tel: 415-371-8500
 Fax: 415-371-0500
 Email: wagstaffe@kerrwagstaffe.com

Counsel for Plaintiffs Dell Inc. and Dell Products L.P.

H. Lee Godfrey
 Kenneth S. Marks
 Jonathan J. Ross
 Johnny W. Carter
 David M. Peterson
 SUSMAN GODFREY L.L.P.
 1000 Louisiana Street, Ste. 5100
 Houston, TX 77002
 Tel: 713-651-9366
 Fax: 713-651-6666
 Email: lgodfrey@susmangodfrey.com
kmmarks@susmangodfrey.com
jross@susmangodfrey.com
jcarter@susmangodfrey.com
dpeterson@susmangodfrey.com

Parker C. Folse III
 Rachel S. Black
 Jordan Connors
 SUSMAN GODFREY L.L.P.

	<p>1201 Third Avenue, Suite 3800 Seattle Washington 98101-3000 Tel: 206-516-3880 Fax: 206-516-3883 Email: pfolse@susmangodfrey.com rblack@susmangodfrey.com jconnors@susmangodfrey.com</p> <p><i>Counsel for Plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust</i></p>
<p>Guido Saveri R. Alexander Saveri Saveri & Saveri, Inc. 706 Sansome Street San Francisco, CA 94111 Tel: 415-217-6810 Fax: 415-217-6813 Email: guido@saveri.com rick@saveri.com</p> <p><i>Interim Lead Counsel for Direct Purchaser Plaintiffs</i></p>	

Executed this 1st day of August, 2014, in San Francisco, California.

/s/ Vanessa Buffington
 Vanessa Buffington